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Lyn Farmer
Chief Administrative Law Judge

ARIZONA CORPORATION COMI



April 10, 2015

NOTICE TO PARTIES TO DOCKET NO. E-01345A-13-0069

All Parties:

Attached please find the unredacted version of emails in possession of the Hearing Division, including the attachment, that were previously filed in redacted form in this docket on March 16, 2015.

A handwritten signature in cursive script, appearing to read "Lyn Farmer".

Lyn Farmer
Chief Administrative Law Judge
Arizona Corporation Commission

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SERVICE LIST FOR: ARIZONA PUBLIC SERVICE COMPANY

DOCKET NO.: E-01345A-13-0069

Thomas L. Mumaw
Melissa M. Krueger
PINNACLE WEST CAPITAL CORPORATION
400 North 5th Street, MS 8695
Phoenix, AZ 85004
Attorneys for APS

Michael A. Curtis
William P. Sullivan
CURTIS, GOODWIN, SULLIVAN, UDALL & SCHWAB, PLC
501 East Thomas Road
Phoenix, AZ 85012-3205
Attorneys for Navopache and Mohave

Tyler Carlson, Chief Operating Officer
Peggy Gillman, Manager of Public Affairs and Energy Services
MOHAVE ELECTRIC COOPERATIVE, INCORPORATED
P.O. Box 1045
Bullhead City, AZ 86430

Charles R. Moore, Chief Executive Officer
NAVOPACHE ELECTRIC COOPERATIVE, INC.
1878 West White Mountain Blvd.
Lakeside, AZ 85929

Patricia C. Ferre
P.O. Box 433
Payson, AZ 85547

Lewis M. Levenson
1308 East Cedar Lane
Payson, AZ 85541

Warren Woodward
55 Ross Circle
Sedona, AZ 86336

Patty Ihle
304 E. Cedar Mill Road
Star Valley, AZ 85541

Page 3

Clara Marie Fritz
6770 W. Hwy 89A, #80
Sedona, AZ 86336

David A. Pennartz
Landon W. Loveland
GUST ROSENFELD PLC
One East Washington, Suite 1600
Phoenix, AZ 85004
Attorneys for the City of Sedona

Janice Alward, Chief Counsel
Legal Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, AZ 85007

Steven M. Olea, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, AZ 85007

Teena Jibilian

From: Steven Olea
Sent: Wednesday, June 04, 2014 8:39 AM
To: Maureen Scott; Teena Jibilian; Sarah Harpring; Ed Stoneburg
Subject: RE: Message from KMBT_751

I would suggest changing the "and/or" to just "and"; specifying a particular federal agency or standard (or removing this piece if there is no specific federal agency or standard); leaving everything else the same. Thanks.

From: Sarah Harpring
Sent: Wednesday, June 04, 2014 7:59 AM
To: Maureen Scott; Teena Jibilian
Cc: Steven Olea; Ed Stoneburg
Subject: RE: Message from KMBT_751

Hi, Maureen. I only looked at this quickly, because I have a hearing today, but the use of "and/or" is still problematic. It actually means "or" as used here, so I would suggest that Staff just use "or" if either encryption or password protection is acceptable, and both are not required. If both are to be required, then "and" should be used instead.

Regarding the reference to federal approval and recommendations, this creates a vague standard. Without more information about which federal entity and in what format the approval and recommendation are made, it would be difficult for a utility to comply with it. Do you have a specific agency's approval and recommendation process in mind? Is there a statute or regulation that could be incorporated by reference, either on the federal or state level? Is there a federal entity that issues an approval and recommendation via a notice in the Federal Register? Either of those would likely tie the rules to a particular version of the statute or regulation, or other notice, but it would establish a clear standard.

Also, continuing to require encryption and password protection still ties utilities to the current technology, which may or may not become obsolete. If it does, the rules would need to be revised at some point to eliminate those requirements and any economic burden incident to their continued maintenance by the utilities. (One example I can think of is a requirement for a utility to ensure its files are backed up on microfilm, or that its video archives are kept on VHS tapes or even CDs or DVDs.)

Teena may have additional comments when she reviews this. Thanks.

Sarah

Sarah N. Harpring
Administrative Law Judge
Arizona Corporation Commission
Hearing Division
1200 W. Washington St., Rm. 104
Phoenix, AZ 85007
Phone: (602) 542-4250
Fax: (602) 542-4230
E-mail: sharpring@azcc.gov

From: Maureen Scott
Sent: Tuesday, June 03, 2014 4:45 PM
To: Sarah Harpring; Teena Jibilian

Cc: Steven Olea; Ed Stoneburg

Subject: FW: Message from KMBT_751

Hi Sarah and Teena, here is a revised Section R14-2-2212 from Steve with some modifications inserted by Ed. Let us know if this resolves your concerns regarding this section. Thanks, Maureen

From: bizhub_751_legal@azcc.gov [mailto:bizhub_751_legal@azcc.gov]

Sent: Tuesday, June 03, 2014 4:38 PM

To: Maureen Scott

Subject: Message from KMBT_751

R14-2-2212. Security Measures for Wireless Transmission of Private Customer Information

- A. A utility shall continuously review and evaluate for use emerging security practices, technologies, protocols, and controls as necessary to update the security practices, technologies, protocols, and controls implemented by the utility.
- B. A utility shall ensure that private customer information transmitted wirelessly is protected from disclosure using encryption and/or password protection and utilizing the latest security practices, technologies, protocols and controls currently accepted as effective in the utility's industry and which are also approved and recommended by the federal government.